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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHANEQUA NORMAN,

Plaintiff,

vs.

NBC OPERATIONS, LLC a Foreign Limited
Liability Company licensed to do business in
Nevada,

Defendant.

Case No.: 2:21-cv-01415-RFB-DJA

**STIPULATION AND ~~PROPOSED~~
ORDER TO AMEND DISCOVERY
PLAN AND SCHEDULING ORDER**

(SECOND REQUEST)

Plaintiff Shanequa Norman (“Plaintiff”) and Defendant NBC Operations, LLC (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate to extend certain discovery deadlines set forth in the Stipulation and Order to Amend Discovery Plan and Scheduling Order (ECF No. 28) by sixty (60) days pursuant to LR 6-1 and 26-4. This is the parties’ second request to extend the discovery deadlines in this matter. The parties are in agreement that the requested extension is in the interest of all parties to allow them to diligently conduct necessary discovery. The parties submit that this additional discovery extension is sought in good faith and will not unduly delay these proceedings.

1. Discovery Completed:

The Joint Discovery Plan and Scheduling Order Submitted in Compliance with LR 26(1)(b) (ECF No. 13) was entered on August 24, 2021. On September 2, 2021, both parties served their initial disclosures under Fed. R. Civ. P. 26(A)(1).

On September 3, 2021, Plaintiff served her First Set of Requests for Production of Documents. On October 5, 2021, Defendant served its responses to those requests and produced approximately 1,800 pages of documents. On October 8, 2021, Defendant served supplemental responses to Plaintiff's requests.

On September 8, 2021, Defendant served its First Set of Interrogatories and First Set of Requests for Production of Documents on Plaintiff. On October 11, 2021, Plaintiff served responses to those requests.

On November 8, 2021, Plaintiff served her Second Set of Requests for Production of Documents, First Set of Interrogatories, and First Set of Requests for Admissions. On December 15, 2021, Defendant served responses to those requests.

In December 2021 and January 2022, Defendant served a number of third-party subpoenas to Plaintiff's medical providers, including to: Nevada Orthopedic & Spine Center, Concentra Medical Centers, Mike O'Callaghan Federal Medical Center, Clear Waters Family Guidance & Wellness Centers, Advanced Psychiatry, Inc., Southwest Medical Associates, Inc., Specialty Surgical of Las Vegas, and Select Physical Therapy. Defendant has received documents from Nevada Orthopedic & Spine Center, Select Physical Therapy, Concentra Medical Centers, and Specialty Surgical of Las Vegas. Defendant is still working with the remaining medical providers to provide documents.

On February 1, 2022, Defendant served its Second Set of Interrogatories, Second Set of Requests for Production of Documents, and First Set of Requests for Admissions. Plaintiff's responses are due on March 16, 2022.

On February 16, 2022, Plaintiff served her Second Set of Interrogatories and Third Request for Production of Documents. Defendant's responses are due on March 18, 2022.

2. Discovery That Remains to be Completed:

The parties anticipate the need to potentially serve additional written discovery on each other and respond to pending discovery requests. The parties anticipate that they will need to take several depositions in this matter, including of Plaintiff and of various employees connected with Defendant. The parties need to make expert witness disclosures and will need to depose any disclosed experts. Defendant also needs to obtain additional medical records from the remaining medical providers it

has subpoenaed.

3. Reasons Why Discovery Has Not Been Completed and Should Be Extended:

The parties request a 60-day extension to the current discovery period. Plaintiff has brought a claim against Defendant for violation of the American's with Disabilities Act. Defendant is in the process of collecting Plaintiff's medical records related to this claim, but needs additional time to collect such records. Although Defendant has been able to obtain records from several medical providers, it is still working with a few additional medical providers to obtain documents. Such records are needed so that Defendant's expert can review and analyze the records. As such, the parties are requesting an additional 60 days so that the relevant medical records can be obtained from Plaintiff's medical providers and the parties' experts can have time to review them prior to the expert disclosure deadline.

4. Proposed Schedule for Pleadings and Completing Remaining Discovery:

The parties stipulate to the following new discovery deadlines:

- a. Discovery Cut-Off Date: **July 13, 2022** (formerly May 13, 2022)
- b. Initial Expert Disclosure: **May 23, 2022** (formerly March 21, 2022)
- c. Rebuttal Expert Disclosure: **June 23, 2022** (formerly April 18, 2022)
- d. Dispositive Motions: **August 16, 2022** (formerly June 16, 2022)
- e. Pretrial Order: **September 15, 2022** (formerly July 15, 2022)

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THEREFORE, the parties stipulate and request that the Court enter an order approving the proposed discovery schedule set forth above.

Dated: February 28, 2022

Dated: February 28, 2022

ARMSTRONG TEASDALE LLP

LAW OFFICE OF MARY CHAPMAN

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ORDER

IT IS ORDERED.

Dated this 1st day of March, 2022.


DANIEL J. ALBRECHTS

DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5 (b). and Section IV of District court of Nevada Electronic Filing Procedures, certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the foregoing was served:

☒ via electronic service to the parties listed in CMECF for this case.

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